

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**VIRAL DRM, LLC,**

**PLAINTIFF,**

**VS.**

**FRIENDLY CHEVROLET, LTD. AND  
BAILEY ADVENTURES, LTD.  
D/B/A MARKET DOCTORS,**

**DEFENDANTS.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 3:24-cv-00003  
JURY**

---

**NOTICE OF FULL SETTLEMENT**

---

**TO THE HONORABLE JEFFREY V. BROWN (U.S.D.J)**

**COME NOW**, Plaintiff Viral DRM, LLC and Defendant Friendly Chevrolet, Ltd (collectively the “Parties”) respectfully notify the Court that they have reached a full and final settlement in this matter, and all conditions of the settlement have been met. Defendant Bailey Adventures, Ltd., having failed to appear and remaining in default, will be dismissed as part of the proposed settlement.

In light of this resolution, the Parties respectfully requests that the Court convert the conditional dismissal to a final judgment and dispose of this case accordingly.

Respectfully submitted,



By:

---

**H. PEYTON INGE IV**  
Texas Bar No. 24053279  
[pinge@kaktxlaw.com](mailto:pinge@kaktxlaw.com)  
[e-service@kaktxlaw.com](mailto:e-service@kaktxlaw.com)



**KERSHAW ANDERSON KING, PLLC**

WHEN IT MATTERS

12400 Coit Road, Suite 800  
Dallas, Texas 75251  
(214) 347-4993 – Telephone  
(214) 615-7361 – Facsimile

**ATTORNEY FOR DEFENDANT  
FRIENDLY CHEVROLET, LTD**

By: 

---

**JAMES H. FREEMAN**  
NY Bar #4001533  
[jfreeman@sanderslaw.group](mailto:jfreeman@sanderslaw.group)  
Direct #: 516-203-7617

**SANDERS LAW GROUP**  
333 Earle Ovington Blvd., Suite 402  
Uniondale, NY 11553  
Tel: 516-203-7600

**ATTORNEY FOR PLAINTIFF  
VIRAL DRM, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was forwarded for electronic filing and service upon all counsel of record via the Court's e-service on February 3, 2025.

A handwritten signature in black ink, appearing to read 'H. Peyton Inge IV', with a long horizontal stroke extending to the right.

---

**H. PEYTON INGE IV**